# 17 HAZARDS AND HAZARDOUS MATERIALS

This chapter evaluates the potential hazardous material and public health impacts from implementation of the Tahoe Vista Partners, LLC Affordable Housing and Interval Ownership Development Project. The analysis presented in this chapter is based on review of the Phase I Environmental Site Assessment (ESA) prepared for the project by CKG Environmental, Inc. in 2005.

### 17.1 AFFECTED ENVIRONMENT

The closest school to the project site is Kings' Beach Elementary, approximately 1.25 miles east. The closest airports are located in Reno, Nevada (approximately 23 miles east), and South Lake Tahoe (approximately 24 miles south). Because the project site is not located within one-quarter mile of an existing or proposed school, or within an airport land use plan or within 2 miles of a public or private airport, issues associated with hazardous materials in proximity to these uses are not evaluated further in this Draft EA/EIR. The project's potential effect on emergency access routes and plans is discussed in Chapter 14, "Traffic, Parking, and Circulation."

The project site was developed as a campground and a restaurant in the late 1930s/early 1940s, and continues to be used in that capacity through the present day. The site includes a number of buildings including a main 2-story commercial building (with a restaurant on the first floor and an apartment and office upstairs), a small office, a small kayak rental building, and a restroom and storage buildings associated with the campground and main commercial building. A Phase 1 ESA was prepared by CKG Environmental, Inc in July 2005 (a copy of which is available for review at the Placer County Planning Department office at the following address: Placer County Planning Department, 565 West Lake Boulevard, Tahoe City, California 96145). The purpose of the Phase I ESA was to document recognized environmental conditions (RECs) on the property related to current and historical uses of the area and to evaluate the potential for release of hazardous materials from on-site or off-site sources that could significantly affect environmental conditions at the project site. The site reconnaissance and records search conducted for the Phase I ESA did not find documentation of RECs in soil or groundwater associated with the historical use of the property (CKG Environmental 2005).

As part of the Phase 1 ESA, a search was performed of several regulatory agencies and databases, including those of the U.S. Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), and Office of Emergency Services (OES). The project site is not listed in any of the regulatory databases (CKG Environmental 2005). No sites within one-quarter mile of the project site have the potential to create a hazardous condition on the project site or in groundwater beneath the site (CKG Environmental 2005).

### **17.1.1 ASBESTOS**

Asbestos is designated as a hazardous substance when the fibers have potential to come in contact with air because the fibers are small enough to lodge in the lung tissue and cause health problems. The presence of asbestos-containing materials (ACMs) in existing buildings poses an inhalation threat only if the ACMs are found to be in a friable state. If the ACMs are not friable, there is no inhalation hazard because asbestos fibers remain bound in the material matrix. Emissions of asbestos fiber to the ambient air, which can occur during activities such as renovation or demolition of structures made with ACMs (e.g., insulation), are regulated in accordance with Section 112 of the federal Clean Air Act.

Many of the on-site structures were built before the 1980s and may have building materials containing asbestos. The Phase I report recommended that an asbestos survey be performed on these structures by a certified California Occupational Safety and Health Administration (Cal-OSHA) inspector prior to any demolition activities (CKG Environmental 2005).

#### 17.1.2 **LEAD PAINT**

Human exposure to lead has been determined by EPA and the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) to be an adverse health risk, particularly to young children. Demolition of structures containing lead-based paint requires specific remediation activities regulated by federal, state, and local laws. The use of lead as an additive to paint was discontinued in 1978. However, many of the on-site structures were built before the 1980s and may contain lead-based paints. A lead-based paint survey should be performed on these structures by a certified Cal-EPA Inspector/Assessor (California Department of Health Services, Childhood Lead Poisoning Prevention Branch) before any demolition activities.

## 17.1.3 POLYCHLORINATED BIPHENYLS

Prior to 1975, polychlorinated biphenyls (PCBs) were commonly used in transformers, capacitors, and fluorescent light ballasts. In 1975, when it was demonstrated that PCBs were highly toxic to the environment, manufacture of PCBs was discontinued in the U.S. Older pole-mounted electrical transformers may contain PCBs. One pole-mounted transformer was observed adjacent to Lake Boulevard and the west side of the project site. However, the transformer was observed to be in good condition and appeared to be relatively new (CKG Environmental 2005), making it unlikely that it would contain any PCBs.

### 17.1.4 Petroleum Hydrocarbons

Two underground storage tanks, approximately 500 gallons each, are located in the southeastern portion of the project site, east of the present main commercial building, at the location of a former gas station. According to the Phase I ESA, test pits were excavated to expose the tanks in 1989. Soil samples were collected and the tanks and associated piping were assessed for organic vapors. Low concentrations of organic vapors were detected in the tanks and piping, but petroleum hydrocarbons were below threshold limits. On March 4, 1998 the Placer County Department of Health and Human Services, Environmental Health Services, issued a letter closing the tank investigation and stating that no cleanup action was required.

## 17.1.5 Mosquito/Vector Control

The climate, topography, and plant communities of the Tahoe Basin provide an abundance and variety of larval mosquito habitats. The restoration of stream environment zones has created additional habitat sources. The mosquito population in the Tahoe Basin is most active in the spring and early summer. The female mosquito needs blood in order to produce eggs. Hosts that can supply blood include reptiles, amphibians, mammals, birds, and humans. All mosquito species are potential vectors of organisms that can cause disease to pets, domestic animals, wildlife, or humans.

The project site is located within the Placer Mosquito Abatement District. The District employs technicians certified by the State of California Health Services in pesticide usage, and mosquito and vector identification. The District routinely conducts surveillance to locate mosquito breeding sources and to solve mosquito problems using physical, biological and chemical means, along with conducting public education outreach efforts.

The District has stated that the materials they use to control both adult and larval mosquitoes are the safest and least toxic materials available for public health mosquito control (Placer Mosquito Abatement District 2006). Biological larvicides include *Bacillus thuringiensis israelensis* and *Bacillus sphaericus*, which are naturally occurring bacteria. Only mosquitoes, black flies, and certain midges are susceptible to these bacteria - other aquatic invertebrates and non-target insects are unaffected. Larvicidal oils and monomolecular films are used to drown the mosquito larvae in their later aquatic stages, when they are not feeding, by forming a thin coating on the surface of the water. For example, methoprene is an insect growth regulator that is target-specific and is designed not to harm mammals, waterfowl, or beneficial predatory insects. The District uses pyrethrins and

pyrethroids for its adult mosquito fogging program in and around populated areas. Pyrethrins are insecticides that are derived from an extract of chrysanthemum flowers, and pyrethroids are synthetic forms of pyrethrins. These are generally applied by truck mounted or hand held foggers.

## 17.1.6 WILDLAND FIRE HAZARDS

Wildland fires represent a significant threat in the State and in Placer County, particularly during the hot, dry summer months in more isolated areas where steep topography, limited access, and heavy fuel loading contribute to hazardous conditions. Wildland fire may be started by natural processes, primarily lightning, or it may be started by human activities. The California Department of Forestry and Fire Protection (CDF) has established a fire hazard severity classification system, which assesses the wildland fire potential based on fuel load, climate, and topography. The classification system provides three classes of fire hazards: Moderate, High, and Very High. Many homes in the High and Very High fire hazard areas are considered by CDF to be without adequate protection from wildland or structural fires. The project site is located in a Moderate fire hazard area (CDF 2001 and 2005), and is located in a developed area adjacent to Lake Tahoe.

The California Public Resources Code requires the designation of State Responsible Areas (SRAs) (based on amount and type of vegetative cover, beneficial water uses, probable erosion damage, fire risks, and hazards), where the financial responsibility of preventing and suppressing fires falls primarily on the State. Fire protection outside the SRAs is the responsibility of local or federal jurisdictions. The project site is not located within an SRA; rather, it is located within the North Tahoe Fire Protection District (NTFPD), which provides local fire protection and emergency services for the north shore area. The closest NTFPD fire station is east of the project site at King's Beach. In addition, other local agencies, such as the Placer County Fire Safe Alliance, work towards improving public outreach on fire prevention and facilitating coordination among state and federal agencies for fuel load reduction, healthy forest ecosystems, and fire safe communities.

## 17.2 REGULATORY SETTING

Hazardous materials handling is subject to numerous laws and regulations at all levels of government. A summary of the most pertinent regulations is provided below.

## 17.2.1 HAZARDOUS MATERIALS MANAGEMENT

Federal and state laws require detailed planning to ensure that hazardous materials are properly handled, used, stored and disposed of, and if such materials are accidentally released, to prevent or to mitigate injury to health or the environment. The Federal Emergency Planning and Community Right to Know Act of 1986 imposes hazardous materials planning requirements to help protect local communities in the event of accidental release.

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories. A business plan includes an inventory of hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies, including the Placer County Department of Environmental Health (PCDEH) and the NTFPD administer laws and regulations.

Storage of hazardous materials in underground tanks is regulated by the SWRCB, which has overall responsibility for implementing all regulations set forth in the California Code of Regulations (CCR). State standards cover installation and monitoring of new tanks, monitoring of existing tanks, and corrective actions for removed tanks.

### 17.2.2 WORKER SAFETY

The Cal-OSHA and the Federal Occupational Safety and Health Administration (Fed-OSHA) are the agencies responsible for assuring worker safety in the handling and use of chemicals in the Occupational Safety and Health Act of 1970. Fed-OSHA has adopted numerous regulations pertaining to worker safety, contained in the Code of Federal Regulations Title 29 (29 CFR). These regulations set standards for safe workplaces and work practices, including standards relating to hazardous material handling. Cal-OSHA assumes primary responsibility for developing and enforcing state workplace regulations. Because California has a federally approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in 29 CFR. Cal-OSHA standards are generally more stringent than federal regulations.

Cal-OSHA regulations pertaining to the use of hazardous materials in the workplace, as detailed in CCR Title 8, include requirements for safety training, availability of safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. Cal-OSHA enforces hazard communication program regulations that contain training and information requirements, including procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparation of health and safety plans to protect workers and employees at hazardous waste sites. The hazard communication program requires that Material Safety Data Sheets (MSDS) be available to employees and that employee information and training programs be documented.

#### 17.2.3 EMERGENCY RESPONSE TO HAZARDOUS MATERIALS INCIDENTS

California has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government and private agencies. Response to hazardous materials incidents is one part of this plan. The plan is managed by the State OES, which coordinates the responses of other agencies including the Cal-EPA, the California Highway Patrol (CHP), California Department of Fish and Game, Lahontan Regional Water Quality Control Board (LRWQCB), Placer County Department of Environmental Health Services, Placer County Sheriff's Department, and NTFPD.

## 17.2.4 HAZARDOUS MATERIALS TRANSPORT

The U.S. Department of Transportation regulates hazardous materials transportation between states. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the CHP and the California Department of Transportation (Caltrans). Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads.

## 17.2.5 HAZARDOUS WASTE MANAGEMENT

The California DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under the Federal Resource Conservation and Recovery Act and the State Hazardous Waste Control Law. Both laws impose comprehensive regulatory systems for handling hazardous waste in a manner that protects human health and the environment.

## 17.2.6 PLACER COUNTY GENERAL PLAN

The Placer County General Plan (County General Plan) includes policies regarding the safe use, manufacture, production, transportation, storage, treatment, disposal, and clean-up of hazardous materials and wastes, as well as

fire protection. The following policies under the Health and Safety section of the County General Plan would apply to the project:

- 8.C.3 The County shall require that new development meets state, county, and local fire district standards for fire protection.
- 8.G.1 The County shall ensure that the use and disposal of hazardous materials in the county complies with local, state, and federal safety standards.
- 8.G.3 The County shall review all proposed development projects that manufacture, use, or transport hazardous materials for compliance with the County's *Hazardous Waste Management Plan*.
- 8.G.5 The County shall strictly regulate the storage of hazardous materials and wastes.
- 8.G.9 The County shall require that applications for discretionary development projects that will generate hazardous wastes or utilize hazardous materials include detailed information on hazardous waste reduction, recycling, and storage.

## 17.2.7 TAHOE VISTA COMMUNITY PLAN

The Tahoe Vista Community Plan (TVCP) does not include any goals or policies related to hazards and hazardous materials.

# 17.2.8 TAHOE REGIONAL PLANNING AGENCY (TRPA)

#### REGIONAL PLAN FOR THE LAKE TAHOE BASIN

TRPA's Regional Plan for the Lake Tahoe Basin (1986) lists the following goals and policies related to hazards and hazardous materials that are applicable to the proposed project:

Chapter 2, Land Use Element, Natural Hazards, Policy 3: Inform residents and visitors of the wildfire hazard associated with occupancy in the Basin. Encourage use of fire resistant materials and fire preventative techniques when constructing structures, especially in the highest fire hazard areas. Manage forest fuels to be consistent with state laws and other goals and policies of this plan.

#### TRPA CODE OF ORDINANCES

The TRPA Code of Ordinances (2004), Section IX, Chapter 75, Section 75.3 provides the following related to hazards and hazardous materials that is applicable to the proposed project:

Vegetation Management to Prevent the Spread of Wildfire: Within areas of significant fire hazard, as determined by local, state, or federal fire agencies, flammable or other combustible vegetation may be removed, thinned, or manipulated up to 30 feet from any structure to prevent the spread of wildfire. Sufficient quantities of residual vegetation should remain in this 30 foot zone to stabilize the soil and prevent erosion. Whenever possible, vegetation in this zone should be thinned, tapered, cut back, or otherwise selectively manipulated, rather than removed entirely. Revegetation with approved species may be required where vegetative ground cover has been eliminated or where erosion problems may occur.

# 17.3 ENVIRONMENTAL CONSEQUENCES AND RECOMMENDED MITIGATION MEASURES

#### 17.3.1 CRITERIA OF SIGNIFICANCE

#### **CEQA CRITERIA**

Based on Appendix G of the CEQA Guidelines, the project would result in significant hazards and hazardous materials impacts if it would:

- create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment or through the routine transport, use, or disposal of hazardous materials:
- result in safety hazards to people residing or working in the project area; or
- expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

## TRPA CRITERIA

Based on TRPA's Initial Environmental Checklist, the proposed project would result in a significant hazards and hazardous materials impacts if it would:

- involve a risk of explosion or the release of hazardous substances;
- create a health hazard or potential health hazard; or
- expose people to potential health hazards.

#### 17.3.2 METHODOLOGY

The following reports documenting potential hazardous conditions at the project site were reviewed for this analysis:

- plans for the project;
- applicable elements from the County general plan and local TRPA and community plans; and
- Phase I Environmental Site Assessment, Sandy Beach Resort (CKG Environmental 2005).

Project activities were evaluated against the hazardous materials information gathered from the above sources to determine whether any risks to public health and safety or other conflicts would occur.

#### 17.3.3 **IMPACT ANALYSIS**

#### ALTERNATIVE A—PROPOSED PROJECT

**IMPACT** 17.A-1

Create a Safety Hazard to Construction Workers. Demolition, excavation, and construction activities at the project site associated with Alternative A could result in the exposure of construction workers to hazardous materials, including asbestos, lead-based paint, and materials contained in underground storage tanks.

Significance Potentially Significant

Mitigation Mitigation Measure 17.A-1. Prepare Site Health and Safety Plan, Conduct Investigation for

Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

Significance after Less Than Significant
Mitigation

The Phase I ESA did not identify any areas of the project site where past operations could have resulted in elevated concentrations of hazardous constituents (i.e., lead, asbestos, petroleum hydrocarbons, pesticides, herbicides, and fertilizers) in surface soils or groundwater. The Phase I ESA did identify the location of two, 500-gallon underground storage tanks (USTs) at the site of a former gas station just east of the existing main commercial building. However, an investigation in 1989 and subsequent closure letter in 1998 from the Department of Environmental Health Services indicated that no health hazards were present and no cleanup activities were required. The applicant has indicated that the only project construction activity that would take place in the area of the USTs would be asphalt paving. Because the paving process would only require excavation to a depth of 10 to 12 inches, the USTs would probably not be affected; however, this determination must be made by a licensed soils or geotechnical engineer.

The Phase I report did identify that asbestos could be present in on-site buildings because of their age. Lead-based paint could be present as well.

Development of the project would involve site grading, excavation for utilities, backfilling, demolition of existing facilities, and construction of new residences and renovation of existing commercial facilities. During construction activities, construction workers could come in contact with and be exposed to hazardous material present in on-site buildings (i.e., asbestos or lead-based paint) or materials contained in USTs, which could create a significant environmental or health hazard; this would be a **potentially significant** impact.

IMPACT 17.A-2 Create a Significant Hazard to the Public or the Environment. Alternative A would involve the storage, use, and transport of hazardous materials at the project site during construction activities. However, use of hazardous materials at the site would be in compliance with local, state, and federal regulations. There are no nearby sources of hazardous materials or wastes that would pose a significant health risk for people at the project site. Project development would not result in increased risk of health hazards from vector-borne diseases or mosquito abatement techniques.

Significance Less Than Significant

Mitigation No Mitigation is Required

Significance after Less Than Significant

Mitigation

Development of the project site with residential and commercial uses would involve the storage, use, and transport of hazardous materials (e.g., asphalt, fuel, lubricants, paint) during construction activities. Transportation of hazardous materials on area roadways is regulated by the CHP and Caltrans, and the use of these materials is regulated by the DTSC, as outlined in Title 22 of the CCR. The project applicant, builders, contractors, business owners, and others would be required to use, store, and transport hazardous materials in compliance with local, state, and federal regulations during project construction and operation.

A search of numerous regulatory databases (CKG Environmental 2005) did not reveal any nearby sources of hazardous materials or waste that would pose a health hazard for residents or construction workers at the project site. The property adjacent to the project site on the east side contains a commercial nursery operation, where low levels of hazardous materials such as pesticides and fungicides may be in use. However, all facilities that use

hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases and provide for appropriate cleanup measures in the event of accidental spill or release. The concentrations of these materials that would be used at the nursery would not be applied at rates sufficient to cause an airborne health hazard at the project site. Furthermore, because the topography in the area slopes southeastward, any type of nursery waste entering the groundwater would flow downgradient from the project site, resulting in a less-than-significant risk at the project site.

The project site is located within the Placer Mosquito Abatement District. The District employs technicians certified by the State of California Health Services in pesticide usage. The District has stated that the materials they use to control both adult and larval mosquitoes are the safest and least toxic materials available for public health mosquito control (Placer Mosquito Abatement District 2006). Pesticides in use include biological controls, such as *Bacillus* sp.; methoprene, an insect growth regulator; and pyrethrins and pyrethroids. The project site has been developed and used as a campground for more than 60 years; therefore, project development would not result in any new risk of exposure to vector-borne diseases or hazards associated with vector control. The risks associated with these factors are no greater at the project site than anywhere else in the Tahoe Basin. Because the County considers its control mechanisms to be appropriate and safe for human exposure, and because the project would not result in a new risk of adverse health effects associated with vector-borne diseases or hazards associated with vector control, this impact is considered **less than significant**.

For the reasons listed above, the project would not create a significant health hazard to the public or the environment. Therefore, this would be a **less-than-significant** impact.

IMPACT Increased Exposure to Wildland Fire Hazard. The project site is not located in a designated wildland fire area or a High Fire Hazard Severity Zone, and adequate fire

protection services are available to serve the proposed project. Furthermore, the project site is already developed and has been in use as a campground for more than 60 years. Therefore, Alternative A would not result in increased exposure of people or structures to

significant risk of loss or injury involving wildland fires.

Significance Less Than Significant

Mitigation No Mitigation is Required

Significance after Less Than Significant

Mitigation

CDF has established a fire hazard severity classification system, which assesses the wildland fire potential based on fuel load, climate, and topography. The classification system provides three classes of fire hazards: Moderate, High, and Very High. The project site is located in an area designated as a Moderate fire hazard zone (CDF 2001 and 2005). Furthermore, the project site is in a developed area where the topography is fairly level, fuel loading is low, and access for fire fighting equipment is good. The project site is within the North Tahoe Fire Protection District (NTFPD), which has a station at King's Beach with capacity to serve the proposed project. The project site is already developed and has been used as a campground for more than 60 years; therefore, no new potential for exposure to a wildland fire would occur. Therefore, the project's potential to increase exposure of people or structures to wildland fire hazards is considered low, and this would be a **less-than-significant** impact.

#### **ALTERNATIVE B—REDUCED DEVELOPMENT**

IMPACT 17.B-1 Create a Safety Hazard to Construction Workers and Residents. This impact is the same as Impact 17.A-1. Demolition, excavation, and construction activities at the project site associated with Alternative B could result in the exposure of construction workers to hazardous materials, including asbestos, lead-based paint, and materials contained in underground storage tanks.

Significance

Potentially Significant

Mitigation

Mitigation Measure 17.B-1. Prepare Site Health and Safety Plan, Conduct Investigation for Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

Significance after

Mitigation

Less Than Significant

IMPACT 17.B-2 Create a Significant Hazard to the Public or the Environment. This impact is the same as Impact 17.A-2. Alternative B would involve the storage, use, and transport of hazardous materials at the project site during construction activities. However, use of hazardous materials at the site would be in compliance with local, state, and federal regulations. There are no nearby sources of hazardous materials or wastes that would pose a significant health risk for people at the project site. Alternative B development would not result in increased risk of health hazards from vector-borne diseases or mosquito abatement techniques.

Significance

Less Than Significant

Mitigation

No Mitigation is Required

Significance after

Mitigation

Less Than Significant

IMPACT 17.B-3 Increased Exposure to Wildland Fire Hazard. This impact is the same as Impact 17.A-3. The project site is not located in a designated wildland fire area or a High Fire Hazard Severity Zone, and adequate fire protection services are available to serve the proposed project. Furthermore, the project site is already developed and has been in use as a campground for more than 60 years. Therefore, Alternative B would not result in increased exposure of people or structures to significant risk of loss of injury involving wildland fires.

Significance

Less Than Significant

Mitigation

No Mitigation is Required

Significance after

Less Than Significant

Mitigation

#### ALTERNATIVE C—REDUCED DEVELOPMENT WITH RECREATION ELEMENTS

IMPACT 17.C-1 Create a Safety Hazard to Construction Workers and Residents. This impact is the same as Impact 17.A-1. Demolition, excavation, and construction activities at the project site associated with Alternative C could result in the exposure of construction workers to hazardous materials, including asbestos, lead-based paint, and materials contained in underground storage tanks.

Significance

Potentially Significant

Mitigation

Mitigation Measure 17.C-1. Prepare Site Health and Safety Plan, Conduct Investigation for Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

Significance after

Mitigation

Less Than Significant

IMPACT 17.C-2 Create a Significant Hazard to the Public or the Environment. This impact is the same as Impact 17.A-2. Alternative C would involve the storage, use, and transport of hazardous materials at the project site during construction activities. However, use of hazardous materials at the site would be in compliance with local, state, and federal regulations. There are no nearby sources of hazardous materials or wastes that would pose a significant health risk for people at the project site. Alternative C development would not result in increased risk of health hazards from vector-borne diseases or mosquito abatement techniques.

Significance

Less Than Significant

Mitigation

No Mitigation is Required

Significance after

Mitigation

Less Than Significant

IMPACT 17.C-3 Increased Exposure to Wildland Fire Hazard. This impact is the same as Impact 17.A-3. The project site is not located in a designated wildland fire area or a High Fire Hazard Severity Zone, and adequate fire protection services are available to serve the proposed project. Furthermore, the project site is already developed and has been in use as a campground for more than 60 years. Therefore, Alternative C would not result in increased exposure of people or structures to significant risk of loss of injury involving wildland fires.

Significance

Less Than Significant

Mitigation

No Mitigation is Required

Significance after

Less Than Significant

Mitigation

#### **ALTERNATIVE D—No Project**

Because there would be no demolition of existing structures under this alternative, there would be no construction-related hazards to construction workers related to potential exposure to asbestos or lead-based paint. There would also be no project-related routine use or transport of hazardous materials. The ongoing risk of health hazards from continued use as a campground adjacent to the commercial nursery and as related to vector control would continue to be less-than-significant, for the same reasons discussed above in Impact 17.A-2. Continued use as a campground would not result in an increased risk of wildland fire hazard, for the same reasons discussed above in Impact 17.A-3. Therefore, impacts related to hazards and hazardous materials would be **less than significant** under Alternative D.

### 17.3.4 MITIGATION MEASURES

#### ALTERNATIVE A—PROPOSED PROJECT

Mitigation Measure 17.A-1. Prepare Site Health and Safety Plan, Conduct Investigation for Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

- For avoid health risks to construction workers, the contractor shall prepare and implement a site Health and Safety Plan. This plan will outline measures that shall be employed to protect construction workers and the public from exposure to hazardous materials during demolition and construction activities through education, physical separation, and compliance with applicable laws and regulations. These measures could include, but would not be limited to posting notices of the presence and use of hazardous materials, limiting access to the site, air monitoring, watering for dust containment, and installation of wind fences. Development contractors shall be required to comply with state health and safety standards for all demolition work. If applicable, this shall include compliance with OSHA and Cal-OSHA requirements regarding exposure to asbestos and lead-based paint.
- ▶ Before demolition of any onsite buildings, the project applicant shall hire a qualified consultant to investigate whether any of these buildings contain asbestos-containing materials that could become friable or mobile during demolition activities, or materials containing lead. If found, the asbestos-containing materials and lead shall be removed by an accredited inspector in accordance with EPA and Cal-OSHA standards. In addition, all activities (construction or demolition) in the vicinity of these materials shall comply with Cal-OSHA asbestos and lead worker construction standards. The asbestos-containing materials and lead shall be disposed of properly at an appropriate off-site disposal facility.
- ► The PCDEH shall be notified if evidence of previously undiscovered soil or groundwater contamination (e.g., stained soil, odorous groundwater) is encountered during excavation. Any contaminated areas shall be remediated in accordance with recommendations made by PCDEH, LRWQCB, DTSC, or other appropriate federal, state, or local regulatory agencies.
- ▶ Before the start of project-related excavation or grading activities in the southeastern portion of the project site, the project applicant shall hire a licensed soils or geotechnical engineer to make a final determination as to whether the USTs would be affected by project-related activities. If the qualified professional determines that the USTs should be removed, the PCDEH shall be notified and the tanks shall be removed and the site remediated in accordance with recommendations made by PCDEH, DTSC, or other appropriate federal, state, or local regulatory agencies.

## **ALTERNATIVE B—REDUCED DEVELOPMENT**

Mitigation Measure 17.B-1. Prepare Site Health and Safety Plan, Conduct Investigation for Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

See Mitigation Measure 17.A-1 described above for Alternative A. The same mitigation discussion would apply.

## ALTERNATIVE C—REDUCED DEVELOPMENT WITH RECREATION ELEMENTS

Mitigation Measure 17.C-1. Prepare Site Health and Safety Plan, Conduct Investigation for Asbestos and Lead-Based Paint, and Prepare Final Determination on USTs.

See Mitigation Measure 17.A-1 described above for Alternative A. The same mitigation discussion would apply.

## **ALTERNATIVE D—No Project**

No mitigation is required.